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July 3, 2006

**VIA ELECTRONIC FILING AND HAND DELIVERY**

The Honorable Joseph J. Farnan, Jr.  
United States District Court  
District of Delaware  
844 King Street  
Wilmington, DE 19801

Re: **L.G. Philips LCD Co. Ltd. v. Tatung Company et. al.,**  
**C.A. No. 05-292 (JJF)**

Dear Judge Farnan:

On behalf of the defendants in the above-referenced action, we are submitting a proposed Jury Questionnaire for the Court's consideration. We respectfully request the Court's approval to submit the enclosed form of jury questionnaire to the prospective jurors in this matter, and a direction to that effect from the Court to the Clerk's Office.

We have provided a copy of the proposed jury questionnaire to counsel for plaintiff, and are informed that plaintiff will not join in this request.

Respectfully,



Steven J. Fineman (#4025)

SXF/ps

Enclosure

cc: Clerk of the Court (By Electronic Filing)  
Richard D. Kirk, Esquire (By Electronic Filing and Hand Delivery)  
Gaspare J. Bono, Esquire (By Telecopy)



<p>14. Your highest level of education completed:</p> <p><input type="checkbox"/> Grade school or less</p> <p><input type="checkbox"/> High school graduate</p> <p><input type="checkbox"/> Some college or AA degree</p> <p><input type="checkbox"/> Technical or vocational school (major): _____</p> <p><input type="checkbox"/> College graduate (major): _____</p> <p><input type="checkbox"/> Post graduate study (major): _____</p>	<p>15. Your <u>spouse or partner's</u> highest level of education completed:</p> <p><input type="checkbox"/> Grade school or less</p> <p><input type="checkbox"/> High school graduate</p> <p><input type="checkbox"/> Some college or AA degree</p> <p><input type="checkbox"/> Technical or vocational school (major): _____</p> <p><input type="checkbox"/> College graduate (major): _____</p> <p><input type="checkbox"/> Post graduate study (major): _____</p>									
<p>16. What social, civic, professional, trade, or other organizations are you affiliated with? If you have ever held any officer positions, please list as well.</p>										
<p>17. Have you or has anyone close to you had training or work experience in any of the following: (Check all that apply)</p> <table border="0"> <tr> <td><input type="checkbox"/> Electrical Engineering</td> <td><input type="checkbox"/> Computer design</td> <td><input type="checkbox"/> LCD monitors</td> </tr> <tr> <td><input type="checkbox"/> Mechanical Engineering</td> <td><input type="checkbox"/> Integrated Circuit Design/Manufacturing</td> <td><input type="checkbox"/> Law</td> </tr> <tr> <td><input type="checkbox"/> Product Development/Design</td> <td><input type="checkbox"/> Electrical Static Discharge</td> <td></td> </tr> </table> <p>IF YES, please explain:</p>		<input type="checkbox"/> Electrical Engineering	<input type="checkbox"/> Computer design	<input type="checkbox"/> LCD monitors	<input type="checkbox"/> Mechanical Engineering	<input type="checkbox"/> Integrated Circuit Design/Manufacturing	<input type="checkbox"/> Law	<input type="checkbox"/> Product Development/Design	<input type="checkbox"/> Electrical Static Discharge	
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<input type="checkbox"/> Product Development/Design	<input type="checkbox"/> Electrical Static Discharge									
<p>18. Have you ever (please check all that apply):</p> <p><input type="checkbox"/> Made a claim for damages</p> <p><input type="checkbox"/> Had a claim for damages made against you</p> <p><input type="checkbox"/> Sued someone else</p> <p><input type="checkbox"/> Been sued by someone else</p>	<p>19. How many times have you served on a jury?</p> <p><input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> More than 2</p> <p>What kinds of cases did you hear?</p> <p><input type="checkbox"/> Civil <input type="checkbox"/> Criminal <input type="checkbox"/> Both Civil and Criminal</p> <p>In how many cases did the jury reach a verdict? _____</p> <p>In how many cases did you serve as foreperson? _____</p> <p>Was your jury experience positive or negative?</p> <p><input type="checkbox"/> Positive <input type="checkbox"/> Mixed <input type="checkbox"/> Negative</p>									
<p>20. Have you experienced any significant losses within the past three years, such as death, divorce, separation, or the loss of a job? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>										
<p>21. What is your primary (most important) source of news?</p> <p><input type="checkbox"/> TV <input type="checkbox"/> Friends</p> <p><input type="checkbox"/> Radio <input type="checkbox"/> Internet</p> <p><input type="checkbox"/> Newspaper <input type="checkbox"/> None, I don't follow the news</p>	<p>22. How often do you read the <u>newspaper</u>?</p> <p><input type="checkbox"/> Daily <input type="checkbox"/> A few times a week</p> <p><input type="checkbox"/> A few times a month <input type="checkbox"/> Rarely or never</p>									
<p>23. How frequently are you a group leader?</p> <p><input type="checkbox"/> Very frequently <input type="checkbox"/> Occasionally <input type="checkbox"/> Never</p>	<p>24. How frequently do you discuss political issues?</p> <p><input type="checkbox"/> Frequently <input type="checkbox"/> Seldom</p> <p><input type="checkbox"/> Occasionally <input type="checkbox"/> Never</p>									
<p>25. From what you have read or heard, do you think in recent years that the money awards from lawsuits have generally been:</p> <p><input type="checkbox"/> Too high <input type="checkbox"/> About right <input type="checkbox"/> Too low</p>	<p>26. Do you feel that a company that is sued should have to prove that it has done nothing wrong?</p> <p><input type="checkbox"/> Yes, definitely <input type="checkbox"/> Yes, probably <input type="checkbox"/> No</p>									
<p>27. Have you ever made a claim for any of the following?</p> <p>Disability <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Workers' Compensation <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Bankruptcy <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>28. Have you or a family member ever been a member of a union?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>									
<p>29. Have you, or has someone close to you, ever applied for or obtained a patent or trademark?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No IF YES, please explain:</p>	<p>30. Have you, or has anyone close to you, ever worked for a company that designed products which later became patented? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>IF YES, please explain:</p>									
<p>31. How likely do you think that it is that the U.S. Patent Office makes mistake in awarding patents?</p> <p><input type="checkbox"/> Very likely <input type="checkbox"/> Not very likely</p> <p><input type="checkbox"/> Somewhat likely <input type="checkbox"/> Not at all likely</p>	<p>32. Have you ever worked for a company that was unfairly harmed by a business competitor?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>									

<p>33. How important are experts in helping you to decide when you are faced with an important decision about what is right and wrong?</p> <p>____ Very Important                      ____ Not very important  ____ Somewhat Important                      ____ Not at all important</p>	<p>34. Do you think that business executives from Taiwan have higher, lower, or the same standards for business ethics as American business executives?</p> <p>____ Higher              ____ Lower              ____ The Same</p>
<p>35. How much do you agree or disagree with the following statement? "It is a good idea that patents protect an inventor from competition for many years to come."</p> <p>____ Strongly Disagree                      ____ Somewhat Agree  ____ Somewhat Disagree                      ____ Strongly Agree</p>	<p>36. How much do you agree or disagree with the following statement? "It is hard for a patent applicant to deceive the U.S Patent Office."</p> <p>____ Strongly Disagree                      ____ Somewhat Agree  ____ Somewhat Disagree                      ____ Strongly Agree</p>
<p>37. How much do you agree or disagree with the following statement? "Patents on new inventions only serve to raise consumer prices on the resulting products."</p> <p>____ Strongly Disagree                      ____ Somewhat Agree  ____ Somewhat Disagree                      ____ Strongly Agree</p>	<p>38. How much do you agree or disagree with the following statement? "An important function of juries in America is to send messages to corporations to improve their behavior."</p> <p>____ Strongly Disagree                      ____ Somewhat Agree  ____ Somewhat Disagree                      ____ Strongly Agree</p>
<p>39. Is there any reason that you might not be able to give a fair hearing in a dispute involving patent infringement?</p> <p>____ Yes, definitely      ____ Yes, probably      ____ No              ____ Not sure</p> <p>IF YES, please explain:</p>	
<p>40. Do you have any ethical, religious, political or other beliefs that might prevent you from serving as a juror?</p> <p>____ Yes              ____ No</p>	<p>IF YES to 63 and/or 64, please explain:</p>
<p>41. Is there anything not covered by this questionnaire that might affect your ability to be a fair and impartial juror?</p> <p>____ Yes              ____ No</p>	
<p>42. The attorneys may need to ask you follow up questions. Are there any questions you would prefer to discuss in private?              ____ Yes              ____ No</p> <p>IF YES, please indicate the question numbers here:</p>	

Below is a list of people and entities that are in some way connected to this case, whether as parties, witnesses or lawyers working on the case. If you know or have any close association with any of these individuals and/or entities (such as a business relationship or social connection), please indicate this by placing a checkmark next to that individual or entity's name.

Parties to the Lawsuit	Possible Witnesses (continued)
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
<b>Lawyers Associated with the Lawsuit</b>	_____
_____	_____
_____	_____
_____	_____
_____	_____
<b>Possible Witnesses</b>	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

If you checked any of the above names, please explain your relationship to each name you have checked:

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*Room for additional explanations:*

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*I swear that all the foregoing is true and correct, and that I completed this questionnaire without any assistance.*

SIGNATURE AND DATE:

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